

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT COURT OF OHIO

FILED

APR 07 2023

Mr. Rosel C. Hurley III.,
12800 Shaker Boulevard, STE 230
Cleveland, OH 44120
Plaintiff,

Judge Donald Nugent

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

-vs-

Civil Action No. 1:21cv1099

National Basketball Players Association,
National Basketball Association, et al.
Defendant,

PLAINTIFFS' MOTION TO COMPEL ARBITRATION

1. Plaintiff hereby respectfully moves the Court to compel Defendant to initiate and engage in an agreed to arbitration proceedings.
2. Plaintiff wants to inform the court that Plaintiff and Defendants issue is covered by the arbitration agreement listed in section 5 of the NBPA Regulations Governing Players Agents (Exhibit A).
3. Plaintiff also wants to inform the Court that Plaintiff and Defendant had agreed to begin arbitration proceedings but Defendant, after agreeing to arbitration, has refused to begin the process. (Exhibit B)
4. This motion is brought pursuant to the Federal Arbitration Act. The arbitration agreement is governed by the FAA and, as such, is valid and enforceable in

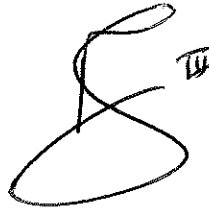
Ohio. It is governed by the FAA because it is in writing, and through negotiation, the parties have agreed to Arbitration.

5. The Plaintiff, pursuant to the agreement, demands that the arbitration proceedings begin promptly.

RESPECTFULLY SUBMITTED,

Mr. Rosel C. Hurley III

Mr. Rosel C. Hurley III
Hurley Law LPA
12800 Shaker Boulevard, STE 230
Cleveland, OH 44120

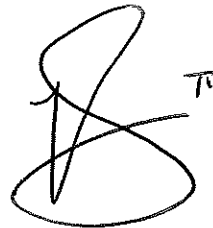
A handwritten signature in black ink, consisting of a stylized 'R' followed by 'C. Hurley III'.

CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2023 the foregoing document was electronically delivered upon Counsel(s) for the defendant, and was filed with the Court on April 7, 2023..

Mr. Rosel C. Hurley III

Mr. Rosel C. Hurley III

A handwritten signature in black ink, consisting of a stylized 'R' followed by 'C. Hurley III'.